

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

**DECLARATION OF MIRANDA D. MEANS IN SUPPORT OF DEFENDANTS
2K GAMES, INC. AND TAKE-TWO INTERACTIVE SOFTWARE, INC.'S
MOTION FOR PATRIAL SUMMARY JUDGMENT**

I, Miranda D. Means, declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP. I submit this declaration in support of Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc.’s (together, “Take-Two”) motion for partial summary judgment.

Deposition Transcripts

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition transcript of Plaintiff James Hayden, dated October 30, 2019.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the deposition transcript of Bernardino Tovanche, dated January 29, 2020.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the deposition transcript of LeBron James, dated June 6, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the deposition transcript of Danny Green, dated June 29, 2022.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the deposition transcript of Tristan Thompson, dated June 3, 2022.

Discovery Responses

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from Plaintiff’s Objections and Responses to Defendants’ First Set of Interrogatories, dated June 14, 2019.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from Plaintiff’s Objections and Responses to Defendants’ First Set of Requests for Admission, dated September 27, 2019.

Additional Documents

9. Attached hereto as **Exhibit 8** is a true and correct copy of a compilation of the following webpage located at <https://www.calfee.com/professionals-kimberly-a-pinter>.

10. Attached hereto as **Exhibit 9** is a true and correct copy of a document bearing Bates Number TAKE-TWO_00000211, produced by Defendants in this matter.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the Response of the Register of Copyrights to Request Pursuant to 17 U.S.C § 411(b)(2), *LADS Network Solutions, Inc. v. Agilis Sys., LLC*, No. 4:19 Civ. 111 (E.D. Mo. Aug. 2, 2021), Dkt. 137.

12. Attached hereto as **Exhibit 11** is a true and correct copy of the Response of the Register of Copyrights to Request Pursuant to 17 U.S.C. § 411(b)(2), *Neman Bros. & Assoc. v. Interfocus, Inc.*, No. 2:20 Civ. 11181 (C.D. Cal. Apr. 6, 2022), Dkt. 85.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the Response of the Register of Copyrights to Request Pursuant to 17 U.S.C. § 411(b)(2), *Oliver v. Meow Wolf, Inc.*, No. 1:20 Civ. 237 (D.N.M. Feb. 2, 2023), Dkt. 529.

Executed this 31st day of October, 2023.

/s/ Miranda D. Means
Miranda D. Means